



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 06 1992

REPLY TO THE ATTENTION OF.

CS-3T

Ms. Kathy Andria
1729 Maple Street
Granite City, IL 62040

Dear Kathy:

Thank you for your comments and participation in our meetings of February 3-4, 1992, in Granite City. Enclosed are copies of the following four documents you requested: (1) the formal public comments on the cleanup by the Mayor of Granite City; (2) an affidavit of the lead expert used by NL Industries and other defendants in lead-paint litigation at another site (page 15 contains references to the risk of soil-lead vs. paint-lead); (3) the motion of the city of Granite City to intervene in the lawsuit and file a complaint; and (4) the reply of the United States to this motion.

Please give Brad or I a call and let us know if you wish to continue to monitor our door-to-door efforts. We look forward to hearing from you.

Sincerely,


Steven Siegel
Assistant Regional Counsel

Enclosures

✓ bcc: Brad Bradley
Rodger Field

EPA Region 5 Records Ctr.



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

FEB 07 1992

REPLY TO THE ATTENTION OF:

CS-3T

TELEFAX AND MAIL

Ms. Sue Bacon
City of Granite City
2000 Edison Avenue
Granite City, IL 62040

Dear Ms. Bacon:

Thank you for meeting with us in Granite City on February 3, 1992, to discuss a campaign to obtain access agreements from property owners in Granite City. The access agreements are for the purpose of sampling residential soil for lead contamination. We are disappointed that the City chose to withdraw its offer to cooperate with U.S. EPA in an access campaign. As we stated at the meeting, however, we believe many of the City's proposals have merit and we plan to implement those ideas to the extent feasible.

The access campaign proposed by the City (attached for your convenience) appears to have three primary components: (1) a local campaign coordinator; (2) a letter from the Mayor supporting the need to sample residential properties; and (3) a revised access agreement. The campaign suggests a mass mailing and a door-to-door effort to obtain access agreements from those who do not respond to the mailing.

At our meeting of February 3, 1992, and in our phone conversation of January 31, 1992, I informed you that U.S. EPA generally supports these proposals. The two primary concerns we raised are the six week time frame for the access campaign and your insistence that U.S. EPA representatives could not be allowed to participate in the door-to-door campaign. The rationales you presented for linking the City's cooperation on an access campaign to U.S. EPA's agreement not to participate in the door-to-door campaign were that U.S. EPA just didn't understand the community and was perceived by the community as less trustworthy than their own local government. It is our belief that the best way we can understand the concerns of the community is to talk directly with the residents who are living in the area likely to be cleaned as part of the Superfund action. We also believe that by combining resources, the project can be completed in the most efficient manner.

Despite the City's withdrawal of its offer, we have not revoked the invitations presented at our meeting. If the City would like to send representatives to accompany and assist representatives of U.S. EPA in a door-to-door campaign requesting access to sample residential soils, please let me know. As I told you in our meeting, we plan to continue a local effort next week, so would need to hear from you soon. In addition, if the City still wishes to prepare a letter urging cooperation by the residents, we would be happy to hand deliver the letter during our door-to-door efforts next week.

A number of the specific recommendations of the City are already in U.S. EPA's plans. Citizens will be provided with advance notice of when representatives of U.S. EPA will take soil samples on their property. U.S. EPA representatives have been available to citizens to ask questions regarding all aspects of the cleanup throughout this project and will remain available to ask questions regarding the sampling.

U.S. EPA plans to adopt the only specific, substantive recommendation the City offered at our meeting to improve the access agreements distributed to citizens. The word "continued" will be removed from paragraph one, line three of the agreements when they are distributed in the future. However, for purposes of both clarity and internal organization, we do not plan to adopt your recommendation to create a "single form" agreement which combines the residential soil sampling agreement with a form requesting a home interior inspection.

One final issue worth noting is the status of the City's willingness to grant access to City owned properties. In our conversation on January 31, I inquired whether you had the access forms to allow U.S. EPA to sample various properties owned by the City and if you could provide me with a signed access agreement for City property. You stated that you had the forms. Before leaving our meeting on February 3, I again requested that you provide me with the City's consent agreement. You chose at that time to neither agree to allow U.S. EPA to sample City property nor to deny access. The City's reluctance to even discuss the status of its willingness to consent to access is somewhat puzzling in light of its stated desire to lead an access campaign urging its residents to voluntarily allow access. I again request that you send me a signed reply to the access agreement for City property.

If the City chooses to reconsider the withdrawal of its offer to assist U.S. EPA in its access campaign, our willingness to work with the City remains.

Sincerely,


Steven Siegel
Assistant Regional Counsel

cc: Craig Tarpoff
Tom Candler
Kathy Andria

bcc: Kevin Holewinski (DOJ)
✓ Brad Bradley (RPM)
Helen Keplinger (OE)
Rodger Field (ORC)
Beverly Kush

note: Craig Tarpoff and Tom Candler are both alderman and can be reached at the same address as Sue Bacon. Only Sue requires the fax or the attachment. Kathy's address is: 1729 Maple Street, Granite City, IL 62040.

Sue's fax # is (618) 452-6224